

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

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HARDEN MANUFACTURING  
CORPORATION, individually and on  
behalf of itself and others similarly situated,

Plaintiff,

v.

PFIZER INC. and PARKE-DAVIS,  
a division of Warner-Lambert Company,

Defendants.

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Civil Action No. 04-10981-PBS

**MOTION FOR ENTRY OF PROTECTIVE ORDER**

Pfizer Inc., Parke-Davis, a Division of Warner-Lambert Company, and Warner-Lambert Company, the Defendants in the above-captioned matter and/or the related matters (MDL 1629), respectfully move, pursuant to the Court's directive and Rule 26(c) of the Federal Rules of Civil Procedure, for the entry of a protective order applicable to the above-captioned matter and all related matters (MDL 1629). The form of protective order that Defendants seek, and the grounds for this motion, are discussed in the accompanying memorandum.

WHEREFORE, Defendants respectfully request that the Court enter, in this action and in the related actions (MDL 1629), a protective order.

Dated: December 21, 2004

PFIZER INC., et al.,

By their attorneys,

s/David B.Chaffin

David B. Chaffin

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**Certificate Of Consultation**

I certify that counsel have conferred and attempted in good faith to resolve or narrow the issue presented by this motion.

s/David B.Chaffin